

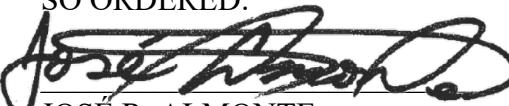


Konstantine G. Paschalidis, Esq.
(212) 404-8644
konstantine@kilegal.com

February 6, 2025

VIA ECF

Hon. Jose R. Almonte
United States Magistrate Judge
United States District Court
District of New Jersey
2 Federal Square
Newark, New Jersey 07102

SO ORDERED:

JOSÉ R. ALMONTE
United States Magistrate Judge
February 7, 2025

Re: Saraci v. Englewood Hospitality, LLC et. al.
2:24-cv-10489-SDW-JRA

Dear Judge Almonte:

This office represents defendants in the above-referenced matter. We write to respectfully request an extension of time to Answer or otherwise respond to the Complaint for 30 days to allow either incoming counsel to file a consent order granting substitution of attorney or for this office to file a motion to be relieved pursuant to Local R. 102.1.

The reason for this request is that Mr. Koutsoudakis departed the firm, and he and not this office will be continuing the representation of defendants. Given our ethical duties under the Rules of Professional Conduct, we cannot file anything on behalf of the departed client Court for tomorrow's deadline. Alternatively, as we remain counsel of record, we must reserve the right to file a motion to be relieved in the event we are not timely substituted.

This is defendants' second request to extend in this case and plaintiff's counsel has consented to this request.

Thank you for your time and attention to this matter.

Respectfully submitted,
**KOUTSOUDAKIS & IAKOVOU
LAW GROUP, PLLC**

s/ Konstantine G. Paschalidis
Konstantine G. Paschalidis
40 Wall Street, 49th Floor
New York, New York 10005
Telephone: (212) 404-8644
Email: konstantine@kilegal.com